

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**THE ESTATE OF DENISE SHORT,
BY AND THROUGH KIERRA CALHOUN, AS
ADMINISTRATRIX, AND KIERRA CALHOUN,
ON BEHALF OF THE WRONGFUL DEATH
BENEFICIARIES OF
DENISE SHORT**

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:24-CV-293-HTW-LGI

**THE MISSISSIPPI DEPARTMENT OF
CORRECTIONS, BURL CAIN, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITIES
AS THE COMMISSIONER OF THE
MISSISSIPPI DEPARTMENT OF CORRECTIONS,
JOHN HUNT, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES AS A SUPERINTENDENT
OF THE CENTRAL MISSISSIPPI CORRECTIONAL
FACILITY, TEREDA HAIRSTON, IN HER
INDIVIDUAL AND OFFICIAL CAPACITIES AS A
SUPERINTENDENT OF THE CENTRAL
MISSISSIPPI CORRECTIONAL FACILITY,
BENJAMIN JENNINGS, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES AS AN EMPLOYEE OF THE
MISSISSIPPI DEPARTMENT OF CORRECTIONS,
CORPORAL ANGELA SMITH, IN HER INDIVIDUAL
AND OFFICIAL CAPACITIES AS AN EMPLOYEE OF
THE MISSISSIPPI DEPARTMENT OF CORRECTIONS,
VITALCORE HEALTH STRATEGIES, LLC, JASMINE
NELSON, KALIAH ROBINSON, ROSALYNN ALLEN,
WHITNEY A. DIXON, AND JOHN/JANE DOES 1-3
and 12-30, IN THEIR INDIVIDUAL
AND OFFICIAL CAPACITIES AS EMPLOYEES
OF THE MISSISSIPPI DEPARTMENT OF CORRECTIONS** **DEFENDANTS**

MOTION TO EXTEND PLAINTIFFS' EXPERT DESIGNATION DEADLINE

COME NOW the Plaintiffs, the Estate of Denise Short, by and through Kierra Calhoun, as Administratrix, and Kierra Calhoun, on behalf of the wrongful death

beneficiaries of Denise Short, and file this, their Motion to Extend Plaintiffs' Expert Designation Deadline, and for grounds, would state as follows:

1. The Plaintiffs' current expert designation deadline is February 18, 2025.
2. As it stands, all Defendants have requested the entry of an Order staying discovery pursuant to local rule 16(b)3.
3. The Plaintiffs concede that such a stay is appropriate. However, an Order has not yet been entered to this effect. As a result, the Plaintiffs would request that they be granted an extension to designate their experts out of an abundance of caution.
4. This request is not made for purposes of delay and would not prejudice any party.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that their deadline to designate experts be extended in the event all discovery is not stayed as requested by the Defendants.

Respectfully submitted, this the 18th day of February, 2025.

THE ESTATE OF DENISE SHORT, BY AND
THROUGH KIERRA CALHOUN, AS
ADMINISTRATRIX AND KIERRA CALHOUN,
ON BEHALF OF THE WRONGFUL DEATH
BENEFICIARIES OF DENISE SHORT

BY: /s/ Victor Bishop

David E. Rozier, Jr. (MSB #5712)
Jenessa Carter Hicks (MSB #103287)
Victor Bishop (MSB #106099)
E. Claire Scott (MSB #106519)
Rozier Legal
PO Box 2388
Oxford, MS 38655
Email: dave@rozierlegal.com
jenessa@rozierlegal.com
vic@rozierlegal.com
claire@rozierlegal.com

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I, the undersigned, one of the attorneys of record for the Plaintiffs, do hereby certify that I have this day filed the foregoing pleading via ECF, which sent notice of such filing to all counsel of record.

This the 18th day of February, 2025.

/s/ Victor Bishop